

Remarks

Allowance of all claims is respectfully requested. With entrance of this Amendment, claims 1, 3-8, 10-15, 18-28, 30-35, 37-42, 45-55, 57, 58, 60-65, 67-72 & 75-84 remain pending.

Initially, Applicants gratefully acknowledge the indication of allowability of claims 4-6, 17-20, 31-33, 44-47, 61-63 & 74-77 if rewritten into independent form including all the limitations of the base claim and any intervening claims. Responsive thereto, claim 14 is amended with the allowable subject matter of claim 17, claim 41 is amended with the allowable subject matter of claim 44, and claim 71 is amended with the allowable subject matter of claim 74. Thus, claims 14, 15, 18-22, 41, 42, 45-49, 71, 72 & 75-79 are in condition for allowance. Allowable dependent claims 4-6, 31-33 & 61-63 have not currently been rewritten into independent form since the amended independent claims from which they ultimately depend are believed to be allowable for the reasons stated below.

In the Office Action, claims 3, 16, 30, 43, 60 & 73 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Responsive thereto, claims 3, 30 & 60 are amended to specify that the term “said node” refers to said each node as recited in the claim. Since the remaining claims at issue in this rejection have been canceled (without prejudice), reconsideration and withdrawal of the rejection is respectfully requested.

By this Amendment, independent claims 1, 23, 28, 50, 55, 57, 58 & 80 are amended to more particularly point out and distinctly claim certain aspects of the present invention. These amendments are submitted in a *bona fide* attempt to further prosecution of the application. Support for the amended language can be found throughout the application as filed. For example, reference canceled claims 2, 9, 29, 36, 59 & 66, as well as FIGS. 4A & 4B and the supporting discussion thereof (e.g., paragraphs [0047] – [0050]). Thus, no new matter is added to the application by any amendment presented.

In the Office Action, claims 1-3, 7-16, 21-30, 34-43, 48-60, 64-73, 78 & 79 were rejected under 35 U.S.C. §102(b) as being anticipated by Chan et al. (U.S. Patent No. 5,303,235; hereinafter Chan). This rejection is respectfully, but most strenuously, traversed to any extent deemed applicable to the claims submitted herewith and reconsideration thereof is

requested. Further, Applicants note that claims 80-84 were filed with this application on June 27, 2001. Consideration of these claims is also respectfully requested.

In one aspect (e.g., see independent claims 1, 23, 28, 50, 55, 57, 58 & 80), Applicants' invention is directed to a technique for providing a group of reachable nodes of a communications environment which includes a plurality of networks. The technique includes dynamically determining a group of reachable nodes of the communications environment. This group of reachable nodes includes a largest set of nodes of the communications environment that can communicate with one another via the same network of the plurality of networks. The group of reachable nodes is then made available to one or more nodes of the communication environment via a globally consistent view of the largest set of nodes of the group of reachable nodes of the communications environment.

It is well settled that there is no anticipation of a claim unless a single prior art reference discloses: (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as the claimed invention; and (4) in order to perform the identical function as the claimed invention. In this instance, Chan fails to disclose various functionality of Applicants' invention as recited in the independent claims at issue, and as a result, does not anticipate (or even render obvious) Applicants' invention.

Chan discloses a technique for detecting reachable network elements in a telecommunications network. In accordance with Chan, a routing exchange protocol is employed to dynamically maintain identity information of network elements reachable within the network, and by enhancing the routing exchange protocol interface to automatically supply an indication that a newly reachable network element has been detected or an indication that an existing network element has ceased to be reachable to an applications layer protocol. The indications of newly reachable network elements and indications that existing network elements cease to be reachable are maintained automatically, thus, avoiding the need for manually inputting such information. (See Chan, column 1, lines 35-55.)

Although Chan does describe a technique for automatically detecting reachable network elements, Applicants respectfully submit that there is no teaching or suggestion therein of their particular technique for identifying and distributing a group of reachable nodes within a communications environment.

In Applicants' technique, there is a dynamic determination of a group of reachable nodes of a communications environment, and this group of reachable nodes includes a largest set of nodes of the communications environment that can communicate with one another via a same network of the plurality of networks. A careful reading of Chan fails to uncover any teaching or suggestion that functionality is provided therein for determining the number of nodes that can communicate with one another via different networks of a plurality of networks of the communications environment, and based thereon, ascertaining a group of reachable nodes which includes the largest set of nodes of the communications environment that can communicate with one another via the same network. In this regard, the Office Action references at page 3, paragraph 6, column 1, lines 35-55 of Chan (relative to canceled claims 2, 29 & 59). No explanation is provided, however, as to how the cited lines of Chan are applied to the subject matter at issue. A careful reading of these lines of Chan fails to uncover any discussion of a plurality of networks, let alone a determination of a group of reachable nodes of the communications environment which includes a largest set of nodes of the communications environment that can communicate with one another via a same network. This determination necessarily includes a determination of the number of nodes which can communicate via each network, and a comparison thereof to obtain the largest set of nodes of the communications environment that can communicate with one another via a same network. No similar functionality is believed taught or suggested by Chan, or the other art of record. For this reason, Applicants respectfully submit that the independent claims presented herewith patentably distinguish over the applied art, and reconsideration and withdrawal of the anticipation rejection based thereon is respectfully requested.

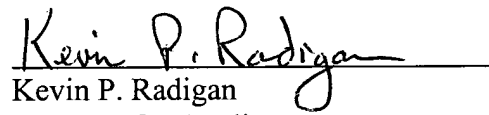
Further, Applicants recite in each independent claim that one or more nodes of the communications environment are provided with an indication of the group of reachable nodes which is a globally consistent view thereof, including a globally consistent view of the largest set of nodes of the group of reachable nodes. This largest set of nodes refers to the largest set of nodes which can communicate with one another via the same network. Again, no similar teaching or suggestion is believed presented by the discussion of Chan. With respect to providing a globally consistent view of reachable nodes, the Office Action relies upon column 5, lines 24-60 of Chan. These lines discuss obtaining a routing table from a network layer and proceeding to register entries within the routing table. A careful reading of this material,

however, fails to uncover any discussion of providing an indication of the group of reachable nodes via a globally consistent view of the largest set of nodes of the group of reachable nodes, wherein the largest set of nodes comprises that largest set of nodes which communicate with one another via a same network of the plurality of networks. For this additional reason, reconsideration and withdrawal of the anticipation rejection based on Chan is respectfully requested.

For at least the above reasons, Applicants respectfully submit that all claims are in condition for allowance, and such action is respectfully requested. The dependent claims are believed allowable for the same reasons as the independent claims, as well as for their own additional characterizations.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicants' undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,


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